

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA

Plaintiff,

v.

Case No. 12-CF189

NICOLE TALSKY,

Defendant-Appellant-Petitioner.

**MOTION FOR A PRE-PLEA RECORD CHECK TO DETERMINE IF
DEFENDANT QUALIFIES FOR SAFETY VALVE**

Defendant Nicole Talsky, by counsel, respectfully requests this Court enter an order direction the Probation Department to conduct and disclose to the parties a pre-plea calculation of Talsky's criminal history and determine whether she qualifies for relief from the mandatory minimum sentence under 18 U.S.C. §3553(f).

Counsel spoke to AUSA Margaret Honrath about this request and the government does not object.

Talsky does not believe this will cause any significant delay in the case. Further, she waives the pre-plea disclosure of this report under FED. R. CRIM. P. 32(e)(1).

Wherefore, Talsky respectfully asks that this Court enter an order directing the United States Probation Department for the Eastern District of Wisconsin to conduct and disclose a pre-plea calculation of Talsky's criminal record check to determine whether she qualifies for safety valve under 18 U.S.C. §3553(f).

Dated at Milwaukee, Wisconsin, July 18, 2013.

Respectfully submitted,

BIZZARO LAW LLC

Counsel for Nicole Talsky, Defendant.

s/ Amelia L. Bizzaro

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